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17 *Plaintiffs' Proposed Co-Lead Counsel*

18
19 **UNITED STATES DISTRICT COURT**
20 **NORTHERN DISTRICT OF CALIFORNIA**
21 **SAN JOSE DIVISION**

22 *In re Google Generative AI Copyright Litigation*

Joseph R. Saveri (State Bar No. 130064)
Cadio Zirpoli (State Bar No. 179108)
Christopher K.L. Young (State Bar No. 318371)
Elissa A. Buchanan (State Bar No. 249996)
Evan A. Creutz (State Bar. No. 349728)
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Master File Case No. 5:23-cv-03440-EKL-SVK
Consolidated Case No. 5:24-cv-02531-EKL-SVK

**DECLARATION OF GREGORY S.
MULLENS IN SUPPORT OF PLAINTIFFS'
MOTION FOR CLASS CERTIFICATION**

Judge: Hon. Eumi K. Lee

1 I, Gregory S. Mullens, hereby declare as follows:

2 1. I am admitted *pro hac vice* before this Court and Of Counsel with Bleichmar Fonti & Auld
3 LLP, counsel for Plaintiffs in this matter. I have personal knowledge of the facts stated herein and, if called
4 upon to do so, could and would testify competently thereto.

5 2. I submit this declaration in support of Plaintiffs' Motion for Class Certification.

6 3. Attached hereto as **Exhibit 1** is a true and correct copy of the Expert Class Certification
7 Report of Meredith McCarron M.S. Ms. McCarron's CV is attached as Appendix A thereto. The training
8 data file structure of Google's virtual training data environment where Plaintiffs' counsel and experts
9 analyzed exemplar training datasets is attached as Appendix B thereto, and the materials she considered
10 for the preparation of her analysis and report, which include certain data and documents produced by
11 Google to date, are attached as Appendix C to her report. Unsealed versions of previously-submitted
12 declarations of Ms. McCarron are attached as Appendices D–F thereto (ECF Nos. 191-3, 209-4, and 224-
13 4). The list of matched Plaintiffs' works identified by Ms. McCarron and her team is attached as Appendix
14 G thereto.

15 4. Attached hereto as **Exhibit 2** is a true and correct copy of the Expert Class Certification
16 Report of Professor David Doermann, Ph.D. Professor Doermann's CV is attached as Appendix A thereto,
17 and the materials he considered for the preparation of his analysis and report, which include certain data
18 and documents produced by Google to date, are attached as Appendix B to his report. A glossary of terms
19 is attached as Appendix C to his report.

20 5. Attached hereto as **Exhibit 3** is a true and correct copy of the Expert Class Certification
21 Report of Victoria Furniss, JD. Ms. Furniss's CV is attached as Appendix A thereto, and the materials she
22 considered for the preparation of her analysis and report, which include certain data and documents
23 produced by Google to date, are attached as Appendix B to her report.

24 6. Attached hereto as **Exhibit 4** is a true and correct copy of the Expert Class Certification
25 Report of Professor Michael Smith Ph.D. Dr. Smith's CV is attached as Appendix A thereto, and the
26 materials he considered for the preparation of his analysis and report, which include certain data and
27 documents produced by Google to date, are attached as Appendix B to his report.

7. Plaintiffs' Counsel directed MK Analytics, Inc. ("MKA") to use 275 as the words-per-page count for purposes of its analysis. See <https://www.masterclass.com/articles/how-long-does-it-take-to-write-a-book> ("average paperback book . . . averaging about 275 words per page"); <https://www.wrightbookassociates.co.uk/blog/book-word-count/> ("On average . . . a typical novel might have around 250 to 350 words per page"); <https://www.creativindie.com/how-many-pages-should-a-novel-have-and-how-many-words-per-chapter> ("Novels are typically . . . about 250 to 300 words per page"); <https://www.publishingtalk.org/writing/how-many-words-in-a-novel-average-word-count-for-books-by-genre> (average of 275 words per page for novels); <https://kindlepreneur.com/words-per-page/> ("The standard book page for books published by traditional publishing companies ranges from 250-300 words.").

8. To ensure that MKA's methodology for books only captured instances where a meaningful amount and substantial portion (of a copyrighted book) was used, Plaintiffs' Counsel directed MKA to use 50%-of-estimated-total-word-count as its minimum threshold. The amount and substantiality of the portion used in relation to the copyrighted work as a whole "is a flexible one, rather than a simple determination of the percentage of the copyrighted work used." *Monge v. Maya Magazines, Inc.*, 688 F.3d 1164, 1179 (9th Cir. 2012); see also *Harper & Row Publishers, Inc. v. Nation Enterprises*, 471 U.S. 539, 565-66 (1985) (the fact that quotes from President Ford's unpublished memoirs played a central role in the allegedly infringing magazine article, constituting 13% of that article, weighed against a finding of fair use); *Salinger v. Random House, Inc.*, 811 F.2d 90, 98 (2d Cir. 1987), *opinion supplemented on denial of reh'g*, 818 F.2d 252 (2d Cir. 1987) (copying of Salinger letters not fair use because, among other factors, secondary work copied one-third of 17 letters and 10% of 42 letters); cf. *Consumers Union of United States, Inc. v. Gen. Signal Corp.*, 724 F.2d 1044 (2d Cir. 1983) (use of one phrase and twenty-nine words from 2100 word article held "insubstantial"), *Maxtone-Graham v. Burtchaell*, 803 F.2d 1253, 1263 (2d Cir. 1986) (defendant's inclusion of 4.3 percent of plaintiffs words in his book "is not incompatible with a finding of fair use"); *New Era Publications Int'l, ApS v. Carol Pub. Grp.*, 904 F.2d 152, 158 (2d Cir. 1990) (holding that use of only a minuscule amount of 25 of the 48 works, 5-6% of 12 of the other works and 8% or more of the 11 remaining works constituted a fair use of plaintiffs work); *Norse v. Henry Holt & Co.*, 847 F. Supp. 142 (N.D. Cal. 1994) (copying of 50 out of 12,000 words was not "quantitatively significant" for purposes of the third factor in the fair use analysis).

1 9. Bowker is the official ISBN agency for the United States. <https://www.bowker.com/>. “As
2 the official ISBN agency of the United States and Australia, Bowker receives data on every book
3 published.” <https://bowkerbookdata.proquest.com/data>. Bowker offers data, for purchase, of up to 164
4 fields of copyright-registration related data including but not limited to ISBN(s), title, copyright year,
5 publication date, page number, contributor, and publisher name. *Id.*; [https://bowkerbookdata.proquest.com](https://bowkerbookdata.proquest.com/data-feeds)
6 [/data-feeds](https://bowkerbookdata.proquest.com/data-feeds).

7 10. Plaintiffs’ Counsel directed MKA to utilize a list of source URLs reflecting pirate websites
8 and shadow libraries in its analysis of the training data. *See Exhibit 5*. “Digital piracy refers to the illegal
9 copying or distribution of copyrighted material via the Internet. It negatively affects the creative industries,
10 including film, TV, publishing, music and gaming.” [https://www.interpol.int/en/Crimes/Illicit-](https://www.interpol.int/en/Crimes/Illicit-goods/Shop-safely/Digital-piracy)
11 [goods/Shop-safely/Digital-piracy](https://www.interpol.int/en/Crimes/Illicit-goods/Shop-safely/Digital-piracy); *see also* 17 U.S.C. § 506(a)(1)(B) (criminalizing the willful
12 “reproduction or distribution, including by electronic means of 1 or more copies of 1 or more copyrighted
13 works, which have a total retail value of more than \$1,000.”).

14 11. The Plaintiffs are typical of the class and will fairly and adequately represent the class. *See*
15 Declaration of Joseph R. Saveri and Lesley E. Weaver in support of Plaintiffs’ Motion for Class
16 Certification, ¶¶ 14-20.

17 12. Attached hereto as **Exhibit 6** is a true and correct copy of Google LLC’s Amended
18 Responses and Objections to Plaintiffs’ Second Set of Requests for Admissions (Nos. 261-586), dated
19 September 12, 2025.

20 13. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts from the transcript of the
21 deposition of Steve Almond, conducted on September 30, 2025.

22 14. Attached hereto as **Exhibit 8** is a true and correct copy of excerpts from the transcript of the
23 deposition of Sarah Andersen, conducted on July 9, 2025.

24 15. Attached hereto as **Exhibit 9** is a true and correct copy of excerpts from the rough transcript
25 of the deposition of Burl Barer, conducted on October 9, 2025.

26 16. Attached hereto as **Exhibit 10** is a true and correct copy of excerpts from the transcript of
27 the deposition of Hope Larson, conducted on June 3, 2025.
28

1 17. Attached hereto as **Exhibit 11** is a true and correct copy of excerpts from the transcript of
2 the deposition of Jill Leovy, conducted on September 16, 2025.

3 18. Attached hereto as **Exhibit 12** is a true and correct copy of excerpts from the transcript of
4 the deposition of Connie McLennan, conducted on August 13, 2025.

5 19. Attached hereto as **Exhibit 13** is a true and correct copy of excerpts from the transcript of
6 the deposition of Defendant's corporate representative Brian Carver, conducted pursuant to Rule 30(b)(6)
7 on July 2, 2025.

8 20. Attached hereto as **Exhibit 14** is a true and correct copy of excerpts from the transcript of
9 the deposition of Defendant's corporate representative Tyler Liechty, conducted pursuant to Rule 30(b)(6)
10 on July 25, 2025.

11 21. Attached hereto as **Exhibit 15** is a true and correct copy of excerpts from the transcript of
12 the deposition of Stephane Jaskiewicz, conducted on August 28, 2025.

13 22. Attached hereto as **Exhibit 16** is a true and correct copy of excerpts from the transcript of
14 the deposition of Jason Baldrige, conducted on August 29, 2025.

15 23. Attached hereto as **Exhibit 17** is a true and correct copy of excerpts from the transcript of
16 the deposition of Li Xiao, conducted on September 12, 2025.

17 24. Attached hereto as **Exhibit 18** is a true and correct copy of excerpts from the transcript of
18 the deposition of Oriol Vinyals, conducted on September 16, 2025.

19 25. Attached hereto as **Exhibit 19** is a true and correct copy of excerpts from the transcript of
20 the deposition of Defendant's corporate representative David Price, conducted pursuant to Rule 30(b)(6)
21 on September 17, 2025.

22 26. Attached hereto as **Exhibit 20** is a true and correct copy of excerpts from the transcript of
23 the deposition of Kareem Ayoub, conducted on September 19, 2025.

24 27. Attached hereto as **Exhibit 21** is a true and correct copy of excerpts from the transcript of
25 the deposition of Defendant's corporate representative Adam Barker, conducted pursuant to Rule 30(b)(6)
26 on October 3, 2025.

27 28. Attached hereto as **Exhibit 22** is a true and correct copy of excerpts from the transcript of
28 the deposition of Andrew Dai, conducted on October 6, 2025.

29. Attached hereto as **Exhibit 23** is a true and correct copy of the Declaration of Daniel Clancy in Support of Google Inc.'s Opposition to Plaintiffs' Motion for Class Certification, dated February 8, 2012, in *The Authors Guild, et al. v. Google Inc.*, No. 1:05-cv-08136-DC (S.D.N.Y.), ECF No. 1004.

30. Attached hereto as **Exhibit 24** is a true and correct copy of the Expert Report of Judith A. Chevalier, dated May 4, 2012, in *The Authors Guild, et al. v. Google Inc.*, No. 1:05-cv-08136-DC (S.D.N.Y.), ECF No. 1034-1.

31. Attached hereto as **Exhibit 25** is a true and correct copy of Exhibit 18 to the Declaration of Michelle Woodhouse, in *Kadrey, et al v. Meta Platforms, Inc.*, Case No. 3:23-cv-03417-VC (N.D. Cal.) ECF No. 567-10.

32. Attached hereto as **Exhibit 26** is a true and correct copy of Exhibit 30 to the Declaration of Michelle Woodhouse, in *Kadrey, et al v. Meta Platforms, Inc.*, Case No. 3:23-cv-03417-VC (N.D. Cal.) ECF No. 567-19.

33. Attached hereto as **Exhibit 27** is a true and correct copy of a document that was marked as Exhibit 17 during the July 25, 2025 deposition of Defendant's corporate representative Tyler Liechty, conducted pursuant to Rule 30(b)(6).

34. Attached hereto as **Exhibit 28** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000013914.

35. Attached hereto as **Exhibit 29** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000013928.

36. Attached hereto as **Exhibit 30** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000014036.

37. Attached hereto as **Exhibit 31** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000014220.

38. Attached hereto as **Exhibit 32** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000014257.

39. Attached hereto as **Exhibit 33** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000014911.

1 40. Attached hereto as **Exhibit 34** is a true and correct copy of a document produced by Google
2 in this action beginning with Bates number GOOG-AIC-000014934.

3 41. Attached hereto as **Exhibit 35** is a true and correct copy of a document produced by Google
4 in this action beginning with Bates number GOOG-AIC-000015660.

5 42. Attached hereto as **Exhibit 36** is a true and correct copy of a document produced by Google
6 in this action beginning with Bates number GOOG-AIC-000017739.

7 43. Attached hereto as **Exhibit 37** is a true and correct copy of a document produced by Google
8 in this action beginning with Bates number GOOG-AIC-000019423.

9 44. Attached hereto as **Exhibit 38** is a true and correct copy of a document produced by Google
10 in this action beginning with Bates number GOOG-AIC-000019701.

11 45. Attached hereto as **Exhibit 39** is a true and correct copy of a document produced by Google
12 in this action beginning with Bates number GOOG-AIC-000022456.

13 46. Attached hereto as **Exhibit 40** is a true and correct copy of a document produced by Google
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15 47. Attached hereto as **Exhibit 41** is a true and correct copy of a document produced by Google
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17 48. Attached hereto as **Exhibit 42** is a true and correct copy of a document produced by Google
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19 49. Attached hereto as **Exhibit 43** is a true and correct copy of a document produced by Google
20 in this action beginning with Bates number GOOG-AIC-000047114.

21 50. Attached hereto as **Exhibit 44** is a true and correct copy of a document produced by Google
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23 51. Attached hereto as **Exhibit 45** is a true and correct copy of a document produced by Google
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25 52. Attached hereto as **Exhibit 46** is a true and correct copy of a document produced by Google
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27 53. Attached hereto as **Exhibit 47** is a true and correct copy of a document produced by Google
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54. Attached hereto as **Exhibit 48** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000047309.

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57. Attached hereto as **Exhibit 51** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000047377.

58. Attached hereto as **Exhibit 52** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000049509.

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60. Attached hereto as **Exhibit 54** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000105862.

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62. Attached hereto as **Exhibit 56** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000111705.

63. Attached hereto as **Exhibit 57** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000115985.

64. Attached hereto as **Exhibit 58** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000115988.

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68. Attached hereto as **Exhibit 62** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000119834.

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70. Attached hereto as **Exhibit 64** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000125257.

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73. Attached hereto as **Exhibit 67** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000203621.

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76. Attached hereto as **Exhibit 70** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000207404.

77. Attached hereto as **Exhibit 71** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000274584.

78. Attached hereto as **Exhibit 72** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000274590.

79. Attached hereto as **Exhibit 73** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000301374.

80. Attached hereto as **Exhibit 74** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000324279.

81. Attached hereto as **Exhibit 75** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000345528.

82. Attached hereto as **Exhibit 76** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000345530.

83. Attached hereto as **Exhibit 77** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000346328.

84. Attached hereto as **Exhibit 78** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000361821.

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87. Attached hereto as **Exhibit 81** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000373099.

88. Attached hereto as **Exhibit 82** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000373189.

89. Attached hereto as **Exhibit 83** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000373306.

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92. Attached hereto as **Exhibit 86** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000385158.

93. Attached hereto as **Exhibit 87** is a true and correct copy of a document produced by Google in this action beginning with Bates number GOOG-AIC-000387855.

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1 96. Attached hereto as **Exhibit 90** is a true and correct copy of a document produced by Google
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9 100. Attached hereto as **Exhibit 94** is a true and correct copy of a document produced by Google
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11 101. Attached hereto as **Exhibit 95** is a true and correct copy of a document produced by Google
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15 103. Attached hereto as **Exhibit 97** is a true and correct copy of a document produced by Google
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25 108. Attached hereto as **Exhibit 102** is a true and correct copy of a document produced by Google
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27 109. Attached hereto as **Exhibit 103** is a true and correct copy of a document produced by Google
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1 110. Attached hereto as **Exhibit 104** is a true and correct copy of a document produced by Google
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3 111. Attached hereto as **Exhibit 105** is a true and correct copy of a document produced by Google
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5 112. Attached hereto as **Exhibit 106** is a true and correct copy of a document produced by Google
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7 113. Attached hereto as **Exhibit 107** is a true and correct copy of a document produced by Google
8 in this action beginning with Bates number GOOG-AIC-000674328.

9 114. Attached hereto as **Exhibit 108** is a true and correct copy of a document produced by Google
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11 115. Attached hereto as **Exhibit 109** is a true and correct copy of a document produced by Google
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23 121. Attached hereto as **Exhibit 115** is a true and correct copy of a document produced by Google
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5 126. Attached hereto as **Exhibit 120** is a true and correct copy of a document produced by Google
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7 127. Attached hereto as **Exhibit 121** is a true and correct copy of a document produced by Google
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9 128. Attached hereto as **Exhibit 122** is a true and correct copy of a document produced by Google
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11 129. Attached hereto as **Exhibit 123** is a true and correct copy of a document produced by Google
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13 130. Attached hereto as **Exhibit 124** is a true and correct copy of a document produced by Google
14 in this action beginning with Bates number GOOG-AIC-000792731.C.

15 131. Attached hereto as **Exhibit 125** is a true and correct copy of a document produced by Google
16 in this action beginning with Bates number GOOG-AIC-000793042.C.

17 132. Attached hereto as **Exhibit 126** is a true and correct copy of a document produced by Google
18 in this action beginning with Bates number GOOG-AIC-000805421.

19 133. Attached hereto as **Exhibit 127** is a true and correct copy of a document produced by Google
20 in this action beginning with Bates number GOOG-AIC-000813651.

21 134. Attached hereto as **Exhibit 128** is a true and correct copy of a document produced by third
22 party Dotdash Meredith, Inc. in this action beginning with Bates number DDM_0001.

23 135. Attached hereto as **Exhibit 129** is a true and correct copy of a document produced by third
24 party Dotdash Meredith, Inc. in this action beginning with Bates number DDM_0013.

25 136. Attached hereto as **Exhibit 130** is a true and correct copy of a document produced by third
26 party Microsoft Corp. in this action beginning with Bates number MSFT_Google_000001.

27 137. Attached hereto as **Exhibit 131** is a true and correct copy of a document produced by third
28 party Microsoft Corp. in this action beginning with Bates number MSFT_Google_000017.

1 138. Attached hereto as **Exhibit 132** is a true and correct copy of a document produced by third
2 party Microsoft Corp. in this action beginning with Bates number MSFT_Google_000031.

3 139. Attached hereto as **Exhibit 133** is a true and correct copy of a document produced by third
4 party Microsoft Corp. in this action beginning with Bates number MSFT_Google_000176.

5 140. Attached hereto as **Exhibit 134** is a true and correct copy of a document produced by third
6 party Microsoft Corp. in this action beginning with Bates number MSFT_Google_000187.

7 141. Attached hereto as **Exhibit 135** is a true and correct copy of a document produced by third
8 party Microsoft Corp. in this action beginning with Bates number MSFT_Google_000198.

9 142. Attached hereto as **Exhibit 136** is a true and correct copy of a document produced by third
10 party Microsoft Corp. in this action beginning with Bates number MSFT_Google_000217.

11 143. Attached hereto as **Exhibit 137** is a true and correct copy of a document produced by third
12 party Microsoft Corp. in this action beginning with Bates number MSFT_Google_000227.

13 144. Attached hereto as **Exhibit 138** is a true and correct copy of a document produced by third
14 party Microsoft Corp. in this action beginning with Bates number MSFT_Google_000239.

15 145. Attached hereto as **Exhibit 139** is a true and correct copy of a document produced by third
16 party Microsoft Corp. in this action beginning with Bates number MSFT_Google_000243.

17 146. Attached hereto as **Exhibit 140** is a true and correct copy of a document produced by third
18 party Microsoft Corp. in this action beginning with Bates number MSFT_Google_000254.

19 147. Attached hereto as **Exhibit 141** is a true and correct copy of a document produced by third
20 party Microsoft Corp. in this action beginning with Bates number MSFT_Google_000256.

21 148. Attached hereto as **Exhibit 142** is a true and correct copy of a document produced by third
22 party Microsoft Corp. in this action beginning with Bates number MSFT_Google_000265.

23 149. Attached hereto as **Exhibit 143** is a true and correct copy of a document produced by third
24 party Microsoft Corp. in this action beginning with Bates number MSFT_Google_000268.

25 150. Attached hereto as **Exhibit 144** is a true and correct copy of a document produced by third
26 party Microsoft Corp. in this action beginning with Bates number MSFT_Google_000278.

27 151. Attached hereto as **Exhibit 145** is a true and correct copy of a document produced by third
28 party Microsoft Corp. in this action beginning with Bates number MSFT_Google_000291.

1 152. Attached hereto as **Exhibit 146** is a true and correct copy of a document produced by third
2 party Microsoft Corp. in this action beginning with Bates number MSFT_Google_000304.

3 153. Attached hereto as **Exhibit 147** is a true and correct copy of a document produced by third
4 party The Atlantic in this action beginning with Bates number TAMG-00001.

5 154. Attached hereto as **Exhibit 148** is a true and correct copy of a document produced by third
6 party John Wiley & Sons, Inc. in this action beginning with Bates number WILEY000001.

7 155. Attached hereto as **Exhibit 149** is a true and correct copy of a document produced by third
8 party John Wiley & Sons, Inc. in this action beginning with Bates number WILEY000020.

9 156. Attached hereto as **Exhibit 150** is a true and correct copy of a document produced by third
10 party John Wiley & Sons, Inc. in this action beginning with Bates number WILEY000033.

11 157. Attached hereto as **Exhibit 151** is a true and correct copy of a document produced by third
12 party John Wiley & Sons, Inc. in this action beginning with Bates number WILEY000049.

13 158. Attached hereto as **Exhibit 152** is a true and correct copy of a document produced by third
14 party John Wiley & Sons, Inc. in this action beginning with Bates number WILEY000068.

15 159. Attached hereto as **Exhibit 153** is a true and correct copy of a document produced by third
16 party John Wiley & Sons, Inc. in this action beginning with Bates number WILEY000092.

17 160. Attached hereto as **Exhibit 154** is a true and correct copy of a document produced by third
18 party John Wiley & Sons, Inc. in this action beginning with Bates number WILEY000107.

19 161. Attached hereto as **Exhibit 155** is a true and correct copy of a document produced by third
20 party John Wiley & Sons, Inc. in this action beginning with Bates number WILEY000115.

21 162. Attached hereto as **Exhibit 156** is a true and correct copy of a document produced by
22 Plaintiffs in this action beginning with Bates number BARER-GOOG-0035578.

23 163. Attached hereto as **Exhibit 157** is a true and correct copy of a document produced by
24 Plaintiffs in this action beginning with Bates number GOOG-PLAINTIFFS-0000009.

25 164. Attached hereto as **Exhibit 158** is a true and correct copy of a document produced by
26 Plaintiffs in this action beginning with Bates number GOOG-PLAINTIFFS-0000019.

27 165. Attached hereto as **Exhibit 159** is a true and correct copy of a document produced by
28 Plaintiffs in this action beginning with Bates number GOOG-PLAINTIFFS-0000092.

1 166. Attached hereto as **Exhibit 160** is a true and correct copy of a document produced by
2 Plaintiffs in this action beginning with Bates number GOOG-PLAINTIFFS-0000139.

3 167. Attached hereto as **Exhibit 161** is a true and correct copy of a document produced by
4 Plaintiffs in this action beginning with Bates number GOOG-PLAINTIFFS-0000143.

5 168. Attached hereto as **Exhibit 162** is a true and correct copy of a document produced by
6 Plaintiffs in this action beginning with Bates number GOOG-PLAINTIFFS-0000182.

7 169. Attached hereto as **Exhibit 163** is a true and correct copy of a document produced by
8 Plaintiffs in this action beginning with Bates number GOOG-PLAINTIFFS-0000186.

9 170. Attached hereto as **Exhibit 164** is a true and correct copy of a document produced by
10 Plaintiffs in this action beginning with Bates number GOOG-PLAINTIFFS-0000189.

11 171. Attached hereto as **Exhibit 165** is a true and correct copy of a document produced by
12 Plaintiffs in this action beginning with Bates number GOOG-PLAINTIFFS-0000230.

13 172. Attached hereto as **Exhibit 166** is a true and correct copy of a document produced by
14 Plaintiffs in this action beginning with Bates number GOOG-PLAINTIFFS-0000237.

15 173. Attached hereto as **Exhibit 167** is a true and correct copy of a document produced by
16 Plaintiffs in this action beginning with Bates number GOOG-PLAINTIFFS-0000244.

17 174. Attached hereto as **Exhibit 168** is a true and correct copy of a document produced by
18 Plaintiffs in this action beginning with Bates number GOOG-PLAINTIFFS-0000247.

19 175. Attached hereto as **Exhibit 169** is a true and correct copy of a document produced by
20 Plaintiffs in this action beginning with Bates number GOOG-PLAINTIFFS-0000250.

21 176. Attached hereto as **Exhibit 170** is a true and correct copy of a document produced by
22 Plaintiffs in this action beginning with Bates number GOOG-PLAINTIFFS-0000253.

23 177. Attached hereto as **Exhibit 171** is a true and correct copy of a document produced by
24 Plaintiffs in this action beginning with Bates number GOOG-PLAINTIFFS-0000256.

25 178. Attached hereto as **Exhibit 172** is a true and correct copy of a document produced by
26 Plaintiffs in this action beginning with Bates number GOOG-PLAINTIFFS-0000262.

27 179. Attached hereto as **Exhibit 173** is a true and correct copy of a document produced by
28 Plaintiffs in this action beginning with Bates number GOOG-PLAINTIFFS-0000305.

1 180. Attached hereto as **Exhibit 174** is a true and correct copy of a document produced by
2 Plaintiffs in this action beginning with Bates number GOOG-PLAINTIFFS-0000305.

3 181. Attached hereto as **Exhibit 175** is a true and correct copy of a document produced by
4 Plaintiffs in this action beginning with Bates number GOOG-PLAINTIFFS-0000441.

5 182. Attached hereto as **Exhibit 176** is a true and correct copy of a document produced by
6 Plaintiffs in this action beginning with Bates number GOOG-PLAINTIFFS-0000444.

7 183. Attached hereto as **Exhibit 177** is a true and correct copy of a document produced by
8 Plaintiffs in this action beginning with Bates number GOOG-PLAINTIFFS-0000447.

9 184. Attached hereto as **Exhibit 178** is a true and correct copy of a document produced by
10 Plaintiffs in this action beginning with Bates number GOOG-PLAINTIFFS-0000450.

11 185. Attached hereto as **Exhibit 179** is a true and correct copy of a document produced by
12 Plaintiffs in this action beginning with Bates number GOOG-PLAINTIFFS-0000453.

13 186. Attached hereto as **Exhibit 180** is a true and correct copy of a document produced by
14 Plaintiffs in this action beginning with Bates number GOOG-PLAINTIFFS-0000454.

15 187. Attached hereto as **Exhibit 181** is a true and correct copy of a document produced by
16 Plaintiffs in this action beginning with Bates number GOOG-PLAINTIFFS-0000473.

17 188. Attached hereto as **Exhibit 182** is a true and correct copy of a document produced by Google
18 in this action beginning with Bates number GOOG-AIC-000035958.

19 189. Attached hereto as **Exhibit 183** is a true and correct copy of a document produced by Google
20 in this action beginning with Bates number GOOG-AIC-000078250.

21 190. Attached hereto as **Exhibit 184** is a true and correct copy of a document produced by Google
22 in this action beginning with Bates number GOOG-AIC-000118693.

23 191. Attached hereto as **Exhibit 185** is a true and correct copy of a document produced by Google
24 in this action beginning with Bates number GOOG-AIC-000119254.

25 192. Attached hereto as **Exhibit 186** is a true and correct copy of a document produced by Google
26 in this action beginning with Bates number GOOG-AIC-000121339.

27 193. Attached hereto as **Exhibit 187** is a true and correct copy of a document produced by Google
28 in this action beginning with Bates number GOOG-AIC-000172514.

1 194. Attached hereto as **Exhibit 188** is a true and correct copy of a document produced by Google
2 in this action beginning with Bates number GOOG-AIC-000274573.

3 195. Attached hereto as **Exhibit 189** is a true and correct copy of a document produced by Google
4 in this action beginning with Bates number GOOG-AIC-000345814.

5 196. Attached hereto as **Exhibit 190** is a true and correct copy of a document produced by Google
6 in this action beginning with Bates number GOOG-AIC-000346842.

7 197. Attached hereto as **Exhibit 191** is a true and correct copy of a document produced by Google
8 in this action beginning with Bates number GOOG-AIC-000406798.

9 198. Attached hereto as **Exhibit 192** is a true and correct copy of a document produced by Google
10 in this action beginning with Bates number GOOG-AIC-000409943.

11 199. Attached hereto as **Exhibit 193** is a true and correct copy of a document produced by Google
12 in this action beginning with Bates number GOOG-AIC-000582310.

13 200. Attached hereto as **Exhibit 194** is a true and correct copy of a document produced by Google
14 in this action beginning with Bates number GOOG-AIC-000674464.

15 201. Attached hereto as **Exhibit 195** is a true and correct copy of a document produced by Google
16 in this action beginning with Bates number GOOG-AIC-000674469.

17 202. Attached hereto as **Exhibit 196** is a true and correct copy of a document produced by Google
18 in this action beginning with Bates number GOOG-AIC-000674532.

19 203. Attached hereto as **Exhibit 197** is a true and correct copy of a document produced by Google
20 in this action beginning with Bates number GOOG-AIC-000744803.

21 204. Attached hereto as **Exhibit 198** is a true and correct copy of a document produced by Google
22 in this action beginning with Bates number GOOG-AIC-000550228.

23 205. Attached hereto as **Exhibit 199** is a true and correct copy of a document produced by Google
24 in this action beginning with Bates number GOOG-AIC-000520533.

25 206. Attached hereto as **Exhibit 200** is a true and correct copy of a document produced by Google
26 in this action beginning with Bates number GOOG-AIC-000115986.

27 207. Attached hereto as **Exhibit 201** is a true and correct copy of a document produced by Google
28 in this action beginning with Bates number GOOG-AIC-000764871.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 14th day of October, 2025, at New York, New York.

/s/ Gregory S. Mullens

Gregory S. Mullens

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Lesley E. Weaver, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14th day of October, 2025, at Oakland, California.

/s/ Lesley E. Weaver

Lesley E. Weaver